BELLSOUTH

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April 18, 2002

WRITTEN EX PARTE

Ms Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 02-35

Dear Ms. Dortch:

At the request of the Common Carrier Bureau staff, BellSouth submits this letter
to provide information related to (1) BellSouth's performance under the metrics
related to LNP Disconnect Timeliness in Georgia and Louisiana and (2)
implementation of changes to improve flow through of CLEC local service orders.

LNP Disconnect Timeliness Metric Performance in GA

In Georgia, BellSouth reports each month its performance related to LNP
Disconnect Timeliness as measured under three different metrics. The
Louisiana Public Service Commission requires BellSouth to report each month
its performance related to LNP Disconnect Timeliness measured under three
different metrics. Bureau staff has requested that BellSouth provide the
performance data it filed with the Georgia Public Service Commission in both
Georgia and Louisiana.

The two following tables summarize BellSouth's performance data for the three
LNP measures for Georgia and the three LNP measures for Louisiana for the
months of November 2001 – February 2002.

GEORGIA

MEASURE	NOV 2001	DEC 2001	JAN 2002	FEB 2002
P-13B % Out of Service < 60 min	98.40%	99.02%	98.99%	97.80%
P-13C % LNP Trigger Applied Prior to DD	100.00%	100.00%	99.99%	100.00%
P-13D Disconnect Timeliness Non-Trigger	84.21%	4.96%	78.45%	41.40%

LOUISIANA

MEASURE	NOV 2001	DEC 2001	JAN 2002	FEB 2002
P-10A LNP Disconnect Timeliness	71.32%	73.25%	68.76%	76.91%
P-10C % Out of Service < 60 min	97.19%	96.58%	98.45%	98.68%
P-10B % LNP Trigger Applied Prior to DD	100.00%	100.00%	100.00%	100.00%

As BellSouth informed the Commission in the Varner Supplemental Affidavit, paragraph 77, BellSouth has discovered some coding issues associated with some of these measures, which BellSouth is investigating. These coding issues affected BellSouth's performance with respect to Georgia measurement P-13D, which does not take into account successful LNP disconnects. As described in paragraph 117 of the Supplemental Reply Affidavit of Alphonso Varner, in December, BellSouth disconnected approximately 3,000 non-trigger orders within the 12-hour benchmark; the information in the database used to gather measurement data, however, could not identify when the disconnect occurred. Thus, while the disconnects were completed on time, the record keeping did not

reflect it, , which has caused BellSouth's performance for this metric in December. BellSouth expects this issue to be corrected with March data.

Status Report on Implementation of Changes to Improve Flow Through

The staff also requested that BellSouth identify changes scheduled to be made between February and May 2002 that would improve flow through of LSRs, and, in particular, those changes requested by the Georgia Flow Through Task Force. Attached is a list of 18 such changes. Eight of them, of which two were on the FTTF request list, were made in February and March 2002. Ten more, of which four come from the FTTF list, are scheduled to be included in BellSouth software release 10.5, which has a release date of May 18, 2002.

In accordance with Section 1.1206, I am filing two copies of this notice and the accompanying attachments and request that you please place them in the record of the proceeding identified above.

Sincerely,

Kathleen B. Levitz

Attachment

cc: Renee Crittenden
       Ian Dillner
       Aaron Goldberger
       Daniel Shiman
       Dennis Johnson
       Susan Pié
       James Davis-Smith

Release Number	Harvest Number	Descriptor
10.3.1	15590	Business Rules for Hunting
10.3.1	20036	Enhancements to Hunting
10.3.1	20074	Validation on TN vs. Address REQTYPEs A and E
10.3.1	20482 *	Allow electronic ordering of UDC Loops
10.4	10884	Add Ability to create new listings in LENs
10.4	15280	Denial/Restoral
10.4	20961	Local Service Freeze-Available for REQTYPE M, non-complex
10.4	21264 *	Flow through Request Type CB, Activity code P and Q
10.5	9710 *	Mechanization of UDC Loop Orders to flow through
10.5	10119 *	Allow electronic ordering of EELs
10.5	11200 *	Change Main Account Number
10.5	12947 *	LSRs in Q status, do not display error message on supplement
10.5	21235	Correct SOER error (008) around ZSCR FID
10.5	21067	Correct SOER error (YPH Lists 010), Directory List Headers UNE-P
10.5	21115	Correct SOER error (RCYC009), relating to ring cycle
10.5	21128	Correct SOER error (PIC and LPIC), REQTYPE E and M
10.5	21234	Correct SOER error (BIR009) and populate a 5 digit zip code
10.5	21235	Correct SOER error (008) around zscr FID associated with Bill Section

Note: * Indicates FTTF items

Release Dates:
10.3.1 – 2/2/2002
10.4 – 3/23/2002
10.5 – 5/18/2002